

## **EXHIBIT F**

1 A. I would assume that the lieutenants would use  
2 their discretion. And if they needed acting sergeants,  
3 they would appoint them. But my experience is you don't,  
4 in every case, make an acting sergeant. If you need it,  
5 you make it.

6 But, for instance, if the sergeant that was  
7 in professional standards at that point, if he was off on  
8 vacation, they would make an actor to go in and take his  
9 spot. So it would depend upon the operational need. If,  
10 in fact, a platoon that should have five sergeants -- and  
11 the scheme then was four sergeants North and one in  
12 Middletown. And if they were short a sergeant because he  
13 had retired or she had retired and another sergeant was  
14 off on vacation and the third one went off with an  
15 injury, that would be a situation and you would expect  
16 that the lieutenant would probably appoint an acting  
17 sergeant, maybe two, based upon the workload and what was  
18 going on at that point in time.

19 But to the best of my knowledge, there is no  
20 county policy that says when a sergeant retires you must  
21 appoint somebody as an actor. It's on an as-needed basis  
22 as I understand it.

23 Q. I'm asking what the reality was, if you know.

24 A. I don't know.



1 graduate until August.

2 Q. You were concerned about turnover among the  
3 patrol officers?

4 A. I was concerned about the authorized strength of  
5 the patrol level, which is where the rubber meets the  
6 road so to speak. They are the officers that handle the  
7 complaints and are on the street. And if you get too  
8 shorthanded there, you've got problems.

9 Q. Are you aware that of the 19 police officers who  
10 have left, 9 are sergeants and lieutenants?

11 A. That would be about right. That would match with  
12 the promotions that we just made.

13 Q. All right. Staffing levels are still a primary  
14 concern of yours?

15 A. Yes.

16 Q. What is the rationale of promoting just before  
17 the busiest time of the year, the summer months?

18 A. We have relief coming in the way of three ready  
19 cops that we are looking to hire and the academy will  
20 graduate in August. In speaking with the lieutenant  
21 colonel, he thought it was critical to move forward with  
22 the promotion of the lieutenants and the sergeants that  
23 have been promoted so that we would maintain the same  
24 supervisory strength that existed prior to December of

